

REMARKS

Claims 1-7 are pending and under consideration.

The sole issue raised in the Office Action is a rejection of claims 1-7 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,507,856 to Chen et al. This reference discloses a system for exchanging and for mixing information, in which a tree structure 355 or an array 355' (see Fig. 7) is produced by an XML (extensible mark up language) parser from a DTD (data type definition) input signal. Then, an XML return message 145 is produced using a template 365 which was formed from the DTD signal 135 by means of a DTD parser 315. That is, the tree structure 355 or array 355' and the template 365 are used as inputs to a merge algorithm 335. The allocation between the input fields and the information in the return message takes place via name tags. The constraint set is used for the identification of name tags in multiple instances.

Column 6 of Chen et al. mentions several key words of independent claim 1. For example, column 6 mentions that a mark up document is parsed. Lines 23-26 state "To avoid ambiguity due to possible usage of the same tags in different locations of the DTD, high level qualifiers or ancestors' name tags may be included in the entries shown in Fig. 8." Further, column 6 states at lines 38-41 "For the same reason as the XML name tag map table 325, higher level qualifiers or ancestors' name tags are included with the name tags 505 in the first column." The Examiner apparently has noticed the similarity in the language and believes that the higher level qualifiers correspond with the highest level filter. However, this is incorrect.

In the entire Chen et al. document, there is no mention of a filter function, as claimed. The tree structure 355 of Chen et al. is completely assembled. It is not limited by filter functions. As described in paragraph 4 of the application, constructing a tree requires a great deal of memory and time, and a query typically runs several times over the constructed tree. Chen et al. describes at column 7, line 66 that all descendents of C are traversed. Column 8, lines 8-19 describe that a search has exhausted all of H's children in block 735. Column 8, lines 11-15 describe that for intermediate nodes, the same general procedure is used. Column 8, lines 22 and 24 describe that the name tags are sequentially scanned or recursively traversed.

One potential advantage of using the claimed filters is described in paragraph 5 of the application. Specifically, the filters may reduce the time required to perform a query of a mark up document and may reduce the size of a memory required to perform the query. Chen et al. does not disclose or suggest the claimed filters. For this reason, the anticipation rejection

should be withdrawn.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450
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